

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

INSURANCE COMPANY OF GREATER)	
NEW YORK, as subrogee of Chelsea Crossing of)	
Southfield Condominium Association,)	Case No. 22-cv-11030
)	
Plaintiff,)	
)	
v.)	
)	
DEANNA JOHNSON, a Michigan resident,)	
)	
Defendant.)	

MOTION FOR EXTENSION OF TIME IN WHICH TO EFFECT SERVICE

NOW COMES the Plaintiff, INSURANCE COMPANY OF GREATER NEW YORK, as subrogee of Chelsea Crossing of Southfield Condominium Association, by and through its attorneys, Foran Glennon Palandech Ponzi & Rudloff PC, and pursuant to Fed. R. Civ. P. 4(m), moves this Court for additional time in which to serve the Defendant, Deanna Johnson, and in support states as follows:

1. Plaintiff initiated this lawsuit against Defendant Deanna Johnson on May 13, 2022 with Summons issued to be served upon the Defendant at 14236 Dale Street, Detroit, Michigan. (Dkt. No.1).
2. Plaintiff's process server attempted to serve the defendant on May 24, 2022 at the 14236 Dale Street, Detroit, Michigan address, and left his contact information on the residence door. See Ex. 1, First Affidavit of Service. (Dkt. 5). According to the process server, the defendant's daughter telephoned and agreed to meet the process server on June 4, 2022 to accept service for Defendant. See Ex. 1.
3. On June 4, 2022, according to the process service, neither the Defendant, Deanna Johnson, nor any other resident answered the door. The process server telephoned the number

provided by the Defendant's "alleged" daughter, who promised to forward the contact information to Deanna Johnson. *See* Ex. 1.

4. On July 14, 2022, having no contact with the Defendant, a skip trace was conducted confirming the residential address for the Defendant, Deanna Johnson, at 14236 Dale Street, Detroit, Michigan.

5. On July 22, 2022, July 26, 2022, July 30, 2022, August 3, 2022, August 9, 2022 and on August 13, 2022, the special process server returned to the residence to attempt to serve Defendant, Deanna Johnson. *See* Ex. 2, Second Affidavit of Service. (Dkt. 6).

6. In light of the fact that by all appearances Defendant resides at the 14236 Dale Street, Detroit, Michigan address, Plaintiff believes service is attainable through surveillance and/or further investigation into Defendant's employer.

7. Plaintiff has exercised diligence in obtaining service of process in this case, and no undue prejudice would result from allowing the Plaintiff more time in which to effect service.

WHEREFORE, Plaintiff, GREATER NEW YORK MUTUAL INSURANCE COMPANY, subrogee of Chelsea Crossing of Southfield Condominium Association, respectively requests an additional 60 days in which to serve the Defendant, Deanna Johnson.

Dated this 9th day of September, 2022.

Respectfully Submitted,

/s/ Brian E. Devilling

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